

Message

From: Rizzo, George [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D1C9950DF21F459CA8F7802659D85C2B-GRIZZO]
Sent: 7/8/2021 12:09:51 PM
To: Henry, JeannaR [Henry.Jeannar@epa.gov]
CC: Zirilli, Alysa [Zirilli.Alysa@epa.gov]; Stanmyer, Ruby [Stanmyer.Ruby@epa.gov]; Zedella, Leah [Zedella.Leah@epa.gov]; Calcinore, Sara [calcinore.sara@epa.gov]; Rick Rogers [Rogers.Rick@epa.gov]
Subject: RE: Clarksburg Timeline

Jeanna,

Thanks for sharing Rick's comments. I expected that it would be revised/updated by others. I may have missed the information that Rick added.

George

George S. Rizzo
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From: Henry, JeannaR <Henry.Jeannar@epa.gov>
Sent: Wednesday, July 07, 2021 4:35 PM
To: Rizzo, George <Rizzo.George@epa.gov>
Cc: Zirilli, Alysa <Zirilli.Alysa@epa.gov>; Stanmyer, Ruby <Stanmyer.Ruby@epa.gov>; Zedella, Leah <Zedella.Leah@epa.gov>; Calcinore, Sara <calcinore.sara@epa.gov>
Subject: FW: Clarksburg Timeline

Hi George,

Rick provided some comments. Please see his message below.

Thanks!

Jeanna R. Henry, Acting Chief
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From: Rogers, Rick <rogers.rick@epa.gov>
Sent: Wednesday, July 07, 2021 4:19 PM
To: Henry, JeannaR <Henry.Jeannar@epa.gov>
Cc: Zedella, Leah <Zedella.Leah@epa.gov>; Calcinore, Sara <calcinore.sara@epa.gov>
Subject: RE: Clarksburg Timeline

See highlighted text. I think its important to note that sampling was done in the past at Tier 1 sites with LSLs but in 2019, the sampling was done at Tier 2 sites because the system indicated that they did not have LSLs in their distribution system.

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From: Henry, JeannaR <Henry.Jeannar@epa.gov>
Sent: Wednesday, July 07, 2021 4:03 PM
To: Rogers, Rick <rogers.rick@epa.gov>
Cc: Zedella, Leah <Zedella.Leah@epa.gov>; Calcinore, Sara <calcinore.sara@epa.gov>
Subject: FW: Clarksburg Timeline

Hi Rick,

Passing along George's message below since you're more familiar with the timeline than I am (although I'll still take a look).

Thanks!

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From: Rizzo, George <Rizzo.George@epa.gov>
Sent: Wednesday, July 07, 2021 3:36 PM

To: Henry, JeannaR <Henry.Jeannar@epa.gov>; Zedella, Leah <Zedella.Leah@epa.gov>
Cc: Zirilli, Alysa <Zirilli.Alysa@epa.gov>; Stanmyer, Ruby <Stanmyer.Ruby@epa.gov>; Crumlish, Karen <Crumlish.Karen@epa.gov>
Subject: FW: Clarksburg Timeline

Jeanna and Leah,

Ruby has been asked to develop a timeline for the Clarksburg event. I prepared the email below to outline the LCR requirements to which Clarksburg seems to mostly complied. Their main LCR issue revolves around the lack of documentation for the sample sites in their sampling pool. Please let me know if you have any questions regarding my summary.

George

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From: Rizzo, George
Sent: Wednesday, July 07, 2021 3:17 PM
To: Ruby Stanmyer <Stanmyer.Ruby@epa.gov>
Subject: Clarksburg Timeline

Ruby,

I haven't developed any timelines recently, but the timeline that you've been asked to develop will be a hybrid because it will include the general requirements of the LCR along with WV's requirements in their AO. Here's the LCR requirements:

- Clarksburg was required to identify a pool of sample sites and prepare a sampling plan per 40 CFR 141.86(a) for LCR compliance prior to initiating sample collection in July 1992. The sample pool sites needed to be classified as Tier 1, 2, or 3. The system needed to justify the inclusion of Tier 2 or 3 sites.
- Clarksburg was required to collect samples from the same sites during each sampling period per 40 CFR 141.86(b)(4). Deviations from the plan needed to be reported to WV per 40 CFR 181.90(a)(1)(v).
- Under the LCR, Clarksburg is classified as a medium size PWS. As such it was required to conduct two consecutive 6-month monitoring periods during July 1 to December 31, 1992 and January 1 to June 30, 1993.
- From the data posted in SDWIS/Fed, the system did not exceed the lead or copper action levels in either monitoring period. Thus, the system was not required to conduct water quality parameter monitoring.
- The tap sampling results allowed WV to determine that the system could be "deemed" to have optimized corrosion control per 40 CFR 141.81(b)(1). This designation was posted in SDWIS/Fed on April 1, 1993.
- The tap sampling results also allowed the system to proceed to reduced sampling status per 40 CFR 141.86(c)(4). The system began annual sampling in 1994, and triennial sampling in 1999.
- The system continued triennial monitoring from 1999 to 2019, with its last sampling period in June to September 2019.
- Their 2010 compliance sampling was performed at 30 homes that were indicated to be Tier 1 sites with lead service lines.

- When the system submitted their sampling plan in 2019, they indicated that the system had no lead service lines. They collected samples during that sampling period from Tier 2 sites which were indicated to have copper plumbing with lead-based solder.

It appears that the system has been in compliance with the LCR until recently when the question about lead service lines arose. The LCR does not specifically require that systems submit revised sample pool lists and sampling plans, but I think that primacy agencies can request them because water systems cannot always maintain the same sample sites over time.

I hope that you can use the above to start your timeline and add the AO requirement to it. Please let me know if you have any questions.

George

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From: Stanmyer, Ruby in Teams <noreply@gcc-email.teams.microsoft.com>

Sent: Wednesday, July 07, 2021 1:02 PM

To: Rizzo, George <Rizzo.George@epa.gov>

Subject: Ruby sent a message

Hi,

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Ruby sent a message in chat with Ruby + 3

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